



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne Governor  
C. Stephen Allred, Director

September 3, 2002

**CERTIFIED MAIL # 7000 1670 0013 9128 7215**

Robin Hunt  
Safety and Environmental Manager  
Harpers, Inc.  
1881 Seltice Way  
Post Falls, ID 83854

RE: AIRS Facility No. 055-00038, Harpers Inc., Post Falls  
Final Tier I Operating Permit

Dear Ms. Hunt:

The Department of Environmental Quality (Department) is issuing Tier I Operating Permit No. 055-00038 for the Harpers, Inc. facility in Post Falls in accordance with the Title V of the Clean Air Act and IDAPA 58.01.01.300 through 386, *Rules for the Control of Air Pollution in Idaho*.

The enclosed permit is effective immediately, summarizes the applicable requirements for your facility, and requires an annual compliance certification for all emissions units.

Tom Harman of the Coeur d'Alene Regional Office will contact you regarding a meeting with the Department to discuss the permit terms and requirements. In addition to your facility's plant manager, the Department recommends your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with the permit conditions attend the meeting.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to IDAPA 58.01.23 (*Rules of Administrative Procedure Before the Board of Environmental Quality*). A petition may be filed with the Hearings Coordinator, Department of Environmental Quality, 1410 N. Hilton, Boise, ID 83706-1255, within 35 days of the date of this decision. However, prior to filing a petition for a contested case, the Department encourages you to contact Bill Rogers at (208) 373-0502 or [wrogers@deq.state.id.us](mailto:wrogers@deq.state.id.us) to address any questions or concerns you may have with the enclosed permit.

Sincerely,

  
Katherine B. Kelly  
Administrator  
Air Quality Division

KK/br Project No. T1-9511-153-1 AIR.SSTV.VO19.0402.470  
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Enclosure

cc: Tom Harman, Coeur d'Alene Regional Office  
Laurie Kral, EPA Region 10



**Air Quality  
TIER I OPERATING PERMIT**

**State of Idaho  
Department of Environmental Quality**

**PERMIT NO.:** 055-00038

**AQCR:** 62

**CLASS:** A

**SIC:** 2520

**ZONE:** 11

**UTM COORDINATE (km):** 502.3 , 5284.7

**1. PERMITTEE**

Harpers, Inc.

**2. PROJECT**

Tier I Operating Permit

**3. MAILING ADDRESS**

1881 W. Seltice Way

**CITY**

Post Falls

**STATE**

ID

**ZIP**

83854

**4. FACILITY CONTACT**

Robin Hunt

**TITLE**

Safety and Environmental Manager

**TELEPHONE**

(208) 777-8400

**5. RESPONSIBLE OFFICIAL**

Stewart Long

**TITLE**

General Manager

**TELEPHONE**

(208) 777-8400

**6. EXACT PLANT LOCATION**

1881 W. Seltice Way, Post Falls, Idaho

**COUNTY**

Kootenai

**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**

Manufacture of metal office furniture

**8. PERMIT AUTHORITY**

This Tier I operating permit is issued pursuant to Idaho Code §39-115 and the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.300 through 386. The permittee shall comply with the terms and conditions of this permit.

This permit incorporates all applicable terms and conditions of prior air quality permits issued by the Department of Environmental Quality for the permitted source, unless the permittee emits toxic pollutants subject to state-only requirements pursuant to IDAPA 58.01.01.210, and the permittee elects not to incorporate those terms and conditions into this operating permit.

The effective date of this permit is the date of signature by the Department on the cover page.

  
KATHERINE B. KELLY, ADMINISTRATOR, AIR QUALITY DIVISION  
DEPARTMENT OF ENVIRONMENTAL QUALITY

**DATE ISSUED:** September 3, 2002

**DATE EXPIRES:** September 3, 2005

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## LIST OF ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AQCR	Air Quality Control Region
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
Department	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gr	grains (1lb = 7,000 gr)
hr/day	hours per day
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/gal, hr, mo, yr	pounds per gallon, hour, month, year
MMBtu	million British thermal units
MMBtu/hr	million British thermal units per hour
NESHAPS	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
scf	standard cubic feet
SIP	State Implementation Plan
SO <sub>2</sub>	sulfur dioxide
T/yr	tons per year
U.S.C.	United States Code
UTM	Universal Transverse Mercator
VOC	volatile organic compound

**AIR QUALITY TIER I OPERATING PERMIT NUMBER: 055-00038**

**Permittee:** Harpers Inc.  
**Location:** Post Falls, Idaho

**Date Issued:** September 3, 2002  
**Date Expires:** September 3, 2005

*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.*

**1. FACILITY-WIDE CONDITIONS**

The following table contains a summary of requirements that apply generally to emissions units at the facility.

**Table 1.1 FACILITY-WIDE APPLICABLE REQUIREMENTS SUMMARY**

<b>Permit Conditions</b>	<b>Parameter</b>	<b>Permit Limit / Standard Summary</b>	<b>Applicable Requirements Reference</b>	<b>Monitoring &amp; Recordkeeping Requirements</b>
1.1	Fugitive emissions	Reasonable control	IDAPA 58.01.01.650-651	1.2, 1.3, 1.4, 1.10, 1.11
1.5	Odors	Reasonable control	IDAPA 58.01.01.775-776	1.6, 1.10, 1.11
1.7	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 1.10, 1.11
1.9	Excess emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130-136	1.9-1.9.5, 1.10, 1.11
1.12	Open burning	Compliance with IDAPA 58.01.01.600-616	IDAPA 58.01.01.600-616	1.10, 1.11
1.13	Renovation or demolition	Compliance with 40 CFR 61, Subpart M	40 CFR 61, Subpart M	1.10, 1.11
1.14	Chemical accidental release	Compliance with 40 CFR 68	40 CFR 68	1.10, 1.11
1.15	Air quality standards	EPA reference test methods	IDAPA 58.01.01.157	1.16
1.16	Criteria air pollutants, opacity	Compliance testing	IDAPA 58.01.01.157	1.10, 1.11, 1.15
1.17	Recycling and emissions reductions	Compliance with 40 CFR 82, Subpart F	40 CFR 82, Subpart F	1.10, 1.11
1.18	Fuel-burning equipment	Grain-loading standard	IDAPA 58.01.01.676-677	1.10, 1.11

***Fugitive Emissions*****1.1 Reasonable Control of Fugitive Emissions**

As required by IDAPA 58.01.01.651, all reasonable precautions shall be taken to prevent particulate matter from becoming airborne. In determining what is reasonable, consideration will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following:

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- Using water or chemicals for controlling dust when demolishing existing buildings or structures, performing construction operations, grading roads, and clearing lands.
- Applying asphalt, oil, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces that can create dust.
- Installing and using hoods, fans, fabric filters, or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
- Covering open-bodied trucks transporting materials likely to give rise to airborne dusts.
- Paving roadways and maintaining them in a clean condition.
- Promptly removing earth or other stored material from streets.

[IDAPA 58.01.01.651, 5/1/94; PTC No. 055-00038, 3/15/02]

- 1.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

- 1.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

- 1.4 The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions, to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each quarterly fugitive emission inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

**Odors**

- 1.5 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775-776, 5/1/94]

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- 1.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07 (state-only), 5/1/94]

**Visible Emissions**

- 1.7 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 4/5/00]

- 1.8 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each quarterly visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.06, 4/5/00]

**Excess Emissions**

- 1.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between Permit Condition 1.9 and the regulations of IDAPA 58.01.01.130-136.
- 1.9.1 The person responsible for or in charge of a facility during an excess emissions event shall, with all practicable speed, initiate and complete appropriate and reasonable action to correct the conditions causing such excess emissions event; to reduce the frequency of occurrence of such events; to minimize the amount by which the emission standard is exceeded; and shall, as provided below or upon request of the Department, submit a full report of such occurrence including a statement of all known causes and of the scheduling and nature of the actions to be taken.

[IDAPA 58.01.01.132, 4/5/00]

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1.9.2 In all cases where startup, shutdown, or scheduled maintenance of any equipment or emission unit is expected to result or results in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to, the following:

[IDAPA 58.01.01.133, 4/5/00]

- A prohibition of any scheduled startup, shutdown, or maintenance resulting in excess emissions shall occur during any period in which an Atmospheric Stagnation Advisory and/or a Wood Stove Curtailment Advisory have/has been declared by the Department.

[IDAPA 58.01.01.133.01.a, 3/20/97]

- Notifying the Department of the excess emissions event as soon as reasonably possible, but no later than two hours prior to the start of the excess emissions event, unless the owner or operator demonstrates to the Department's satisfaction that a shorter advanced notice was necessary.

[IDAPA 58.01.01.133.01.b, 4/5/00]

- The owner or operator of a source of excess emissions shall report and record the information required pursuant to Permit Conditions 1.9.4 and 1.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[IDAPA 58.01.01.133.01.c, 3/20/97]

1.9.3 In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:

[IDAPA 58.01.01.134, 4/5/00]

1.9.3.1 For all equipment or emissions units from which excess emissions result during upset or breakdown conditions, or for other situations that may necessitate the implementation of safety measures which cause excess emissions, the facility owner or operator shall comply with the following:

[IDAPA 58.01.01.134.02, 4/5/00]

- The owner or operator shall immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.

[IDAPA 58.01.01.134.02.a, 4/5/00]

- The owner or operator shall notify the Department of any upset, breakdown, or safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than 24 hours after the event, unless the owner or operator demonstrates to the Department's satisfaction that the longer reporting period was necessary.

[IDAPA 58.01.01.134.02.b, 4/5/00]

- The owner or operator shall report and record the information required pursuant to Permit Conditions 1.9.4 and 1.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.

[IDAPA 58.01.01.134.02.c, 3/20/97]



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- 1.9.3.2 During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, the Department may require the owner or operator to immediately reduce or cease operation of the equipment or emissions unit causing the excess emissions until such time as the condition causing the excess emissions has been corrected or brought under control. Such action by the Department shall be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the facility owner or operator.

[IDAPA 58.01.01.134.03 4/5/00]

- 1.9.4 A written report for each excess emissions event shall be submitted to the Department by the owner or operator no later than 15 days after the beginning of such an event. Each report shall contain the information specified in IDAPA 58.01.01.135.02.

[IDAPA 58.01.01.135.01, 3/20/97; IDAPA 58.01.01.135.02, 4/5/00]

- 1.9.5 The owner or operator shall maintain excess emissions records at the facility for the most recent five-calendar-year period. The excess emissions records shall be made available to the Department upon request. The excess emissions records shall include the information requested by IDAPA 58.01.01.136.03(a) and (b) as summarized in the following:

[IDAPA 58.01.01.136.01, 02, 3/20/97; IDAPA 58.01.01.136.03, 4/5/00]

- An excess emissions record book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to the Department pursuant to IDAPA 58.01.01.135 for the particular emissions unit or equipment.
- Copies of all startup, shutdown, and scheduled maintenance procedures and upset, breakdown, and safety preventative maintenance plans that have been developed by the owner or operator in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

[IDAPA 58.01.01.136.03.a, 4/5/00]

[IDAPA 58.01.01.136.03.b, 3/20/97; IDAPA 58.01.01.130-136, 4/5/00]

(state-only; federally-enforceable upon approval into the SIP); IDAPA 58.01.01.322.08.b, 3/23/98]

**Reports and Certifications**

- 1.10 All periodic reports and certifications required by this permit shall be submitted to the Department within 30 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130-136. Reports, certifications, and notifications shall be submitted to:

Air Quality Permit Compliance  
Department of Environmental Quality  
Coeur d'Alene Regional Office  
2110 Ironwood Parkway  
Coeur d'Alene, ID 83814  
Phone: (208) 769-1422  
Fax: (208) 769-1404

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The periodic compliance certification required by General Provision 21 shall also be submitted within 30 days of the end of the specified reporting period to:

EPA Region 10  
Air Operating Permits, OAQ-107  
1200 Sixth Ave.  
Seattle, WA 98101

[IDAPA 58.01.01.322.08, 11, 5/1/94]

***Monitoring and Recordkeeping***

- 1.11 The permittee shall maintain sufficient recordkeeping to assure compliance with all of the terms and conditions of this operating permit. Recording of monitoring information shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to Department representatives upon request.

[IDAPA 58.01.01.322.07, 5/1/94]

***Open Burning***

- 1.12 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, *Rules for Control of Open Burning*.

[IDAPA 58.01.01.600-616, 5/1/94]

***Renovation/Demolition***

- 1.13 The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

[40 CFR 61, Subpart M]

***Regulated Substances for Accidental Release Prevention***

- 1.14 An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
- The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10 (a)]

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**Test Methods**

- 1.15 If testing is required, the permittee shall use the test methods listed in Table 1.2 to measure the pollutant emissions.

**Table 1.2 EPA Reference Test Methods**

Pollutant	Test Method*	Special Conditions
PM	EPA Method 5	
PM <sub>10</sub>	EPA Method 201.a. and 202	
NO <sub>x</sub>	EPA Method 7	
SO <sub>2</sub>	EPA Method 6	
CO	EPA Method 10	
VOC	EPA Method 25	
Opacity	EPA Method 9	If an NSPS source, IDAPA 58.01.01.625 and Method 9; otherwise, IDAPA 58.01.01.625 only.

\*Or a Department-approved alternative in accordance with IDAPA 58.01.01.157

**Compliance Testing**

- 1.16 If testing is required, the permittee shall provide notice of intent to test to the Department at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by Department approval. The Department may, at its option, have an observer present at any emissions tests conducted on a source. The Department requests that such testing not be performed on weekends or state holidays.

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior Department approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval for any testing deviations, the Department may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any compliance test, the permittee is encouraged to submit in writing to the Department, at least 30 days in advance, the following for approval:

- The type of test method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

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Within 30 days following the date in which a compliance test required by this permit is concluded, the permittee shall submit to the Department a compliance test report for the respective test. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to:

Air Quality Permit Compliance  
Department of Environmental Quality  
Coeur d'Alene Regional Office  
2110 Ironwood Parkway  
Coeur d'Alene, ID 83814  
Phone: (208) 769-1422  
Fax: (208) 769-1404

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

***Recycling and Emissions Reductions***

- 1.17 The permittee shall comply with applicable standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, Recycling and Emissions Reduction.

[40 CFR 82, Subpart F]

***Fuel-burning Equipment***

- 1.18 The permittee shall not discharge to the atmosphere from any fuel-burning equipment particulate matter in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, 0.050 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

[IDAPA 58.01.01.676-677, 5/1/94]

***National Emission Standards for Hazardous Air Pollutants for Metal Furniture***

- 1.19 The permittee must comply with the provisions of 40 CFR 63, Subpart RRRR, National Emission Standards for Hazardous Air Pollutants for metal furniture, when the standard has been finalized.

[40 CFR 63, Subpart RRRR]

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## 2. DRY-OFF OVEN

### Summary Description

The following is a narrative description of the dry-off oven burner regulated in this Tier I operating permit. This description is for informational purposes only.

Steel furniture parts go through a washing operation. When the parts exit the last stage of the washer, they are carried by the overhead conveyor through the dry-off oven. This oven is heated with a natural gas burner with a heat-input capacity of 3.5 MMBtu/hr. The burner has two stacks: stack 23 and stack 24.

### Permit Limits / Standard Summary

Table 2.1 contains a summary of the requirements that apply to the dry-off oven burner stacks. Specific permit requirements are listed below Table 2.1.

**Table 2.1 APPLICABLE REQUIREMENTS SUMMARY**

Permit Conditions	Affected Emission Point	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring & Recordkeeping Requirements
2.1	Stack 23	NO <sub>x</sub>	0.49 lb/hr, 2.15 T/yr	IDAPA 58.01.01.322.01, PTC No. 055-00038	1.11, 2.3, 2.4
	Stack 24		0.49 lb/hr, 2.15 T/yr		
2.2	Stack 23	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625, PTC No. 055-00038	1.8, 1.10, 1.11
	Stack 24				
2.3	Dry-off oven burner	Fuel type	Natural gas exclusively	IDAPA 58.01.01.322.14, PTC No. 055-00038	1.11
2.4	Dry-off oven burner	Burner heat-input capacity (maximum)	3.5 MMBtu/hr	IDAPA 58.01.01.322.14	1.11

- 2.1 Nitrogen oxides emissions from dry-off oven burner stack 23 shall not exceed 0.49 lb/hr and 2.15 T/yr. Nitrogen oxides emissions from dry-off oven burner stack 24 shall not exceed 0.49 lb/hr and 2.15 T/yr.  
[IDAPA 58.01.01.322.01, 3/19/99; PTC No. 055-00038, 3/15/02]
- 2.2 Visible emissions from any stack, vent, or functionally equivalent opening shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period in accordance with IDAPA 58.01.01.625 and as determined by procedures contained in IDAPA 58.01.01.625.  
[IDAPA 58.01.01.625, 4/5/00; PTC No. 055-00038, 3/15/02]

**AIR QUALITY TIER I OPERATING PERMIT NUMBER: 055-00038**

**Permittee:** Harpers Inc.  
**Location:** Post Falls, Idaho

**Date Issued:** September 3, 2002  
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- 2.3 The dry-off oven burner shall be fueled with natural gas exclusively.  
[IDAPA 58.01.01.322.14, 5/1/94; PTC No. 055-00038, 3/15/02]
- 2.4 The heat-input capacity of the dry-off oven burner shall not exceed 3.5 MMBtu/hr.  
[IDAPA 58.01.01.322.14, 5/1/94]

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**3. BAKE OVEN****Summary Description**

The following is a narrative description of the bake oven stacks regulated in this Tier I operating permit. This description is for informational purposes only.

After the dry-off oven, the steel furniture parts are painted and conveyed to a two-stage bake oven. Bake oven stage 1 and stage 2 each use a 6 MMBtu/hr natural gas-fired burner to supply heat to dry the paint. A third, 6 MMBtu/hr natural gas-fired burner is used as a space heater that provides heat for the bake oven room during the winter months. Bake oven stages 1 and 2 exhaust emissions through stacks 29 and 30, respectively. The bake oven space heater vents emissions through stack 26.

**Permit Limits / Standard Summary**

Table 3.1 contains a summary of the requirements that apply to the bake oven stacks 26, 29, and 30. Specific permit requirements are listed below Table 3.1.

**Table 3.1 BAKE OVEN EMISSIONS AND APPLICABLE REQUIREMENTS SUMMARY**

Permit Conditions	Affected Emissions Point	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring & Recordkeeping Requirements
3.1	Stack 26	NO <sub>x</sub>	0.74 lb/hr, 3.26 T/yr	IDAPA 58.01.01.322.01, PTC No. 055-00038	1.11, 3.3, 3.4
	Stack 29		0.75 lb/hr, 3.27 T/yr		
	Stack 30		0.75 lb/hr, 3.27 T/yr		
3.2	Stack 26	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625, PTC No. 055-00038	1.8, 1.10, 1.11
	Stack 29				
	Stack 30				
3.3	Bake oven space heater (quantity = 1), Bake oven burners (quantity = 2)	Burner heat-input capacity (maximum)	6 MMBtu/hr	IDAPA 58.01.01.322.14	1.11
3.4	Bake oven space heater (quantity = 1), Bake oven burners (quantity = 2)	Fuel type	Natural gas exclusively	IDAPA 58.01.01.322.14, PTC No. 055-00038	1.11

- 3.1 Nitrogen oxides emissions from bake oven stack 26 shall not exceed 0.74 lb/hr and 3.26 T/yr.  
 Nitrogen oxides emissions from bake oven stack 29 shall not exceed 0.75 lb/hr and 3.27 T/yr.  
 Nitrogen oxides emissions from bake oven stack 30 shall not exceed 0.75 lb/hr and 3.27 T/yr.

[IDAPA 58.01.01.322.01, 3/19/99; PTC No. 055-00038, 3/15/02]

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- 3.2 Visible emissions from any stack, vent, or functionally equivalent opening shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period in accordance with IDAPA 58.01.01.625 and as determined by procedures contained in IDAPA 58.01.01.625.  
[IDAPA 58.01.01.625, 4/5/00; PTC No. 055-00038, 3/15/02]
- 3.3 The heat-input capacity for bake oven stage 1 and stage 2 burners and the bake oven room space heater shall not exceed 6.0 MMBtu/hr each.  
[IDAPA 58.01.01.322.14, 5/1/94]
- 3.4 The bake oven burners and the bake oven room space heater burner shall be fueled exclusively with natural gas.  
[IDAPA 58.01.01.322.14, 5/1/94; PTC No. 055-00038, 3/15/02]



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#### 4. BURN-OFF OVEN

##### **Summary Description**

The following is a narrative description of the burn-off oven regulated in this Tier I operating permit. This description is for informational purposes only.

After the parts have been processed through the bake oven, the burn-off oven is used to remove dried paint from conveyor part hangers and other paint-encrusted steel parts. The oven has a 2.0 MMBtu/hr natural gas-fired burner.

##### **Permit Limits / Standard Summary**

Table 4.1 contains a summary of the requirements that apply to the burn-off oven stack. Specific permit requirements are listed below Table 4.1.

**Table 4.1 BURN-OFF OVEN EMISSIONS AND APPLICABLE REQUIREMENTS SUMMARY**

<b>Permit Conditions</b>	<b>Parameter</b>	<b>Permit Limit / Standard Summary</b>	<b>Applicable Requirements Reference</b>	<b>Monitoring &amp; Recordkeeping Requirements</b>
4.1	NO <sub>x</sub>	0.67 lb/hr, 2.94 T/yr	IDAPA 58.01.01.203.02, PTC No. 055-00038	1.11, 4.3, 4.4
4.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625, PTC No. 055-00038	1.8, 1.10, 1.11
4.3	Fuel type	Natural gas exclusively	PTC No. 055-00038	1.11
4.4	Burner heat-input capacity	2 MMBtu/hr	IDAPA 58.01.01.322.14	1.11
4.5	Minimum oven temperature	1400 degrees Fahrenheit	PTC No. 055-00038	4.8
4.6	Throughput limit on oven	6,000 parts per day	PTC No. 055-00038	4.9
4.7	Oven use	Thermally-clean parts	PTC No. 055-00038	None

- 4.1 Nitrogen oxides emissions from the burn-off oven stack shall not exceed 0.67 lb/hr or 2.94 T/yr.  
[IDAPA 58.01.01.322.01, 3/19/99; PTC No. 055-00038, 3/15/02]
- 4.2 Visible emissions from any stack, vent, or functionally equivalent opening shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period in accordance with IDAPA 58.01.01.625 and as determined by procedures contained in IDAPA 58.01.01.625.  
[IDAPA 58.01.01.625, 4/5/00; PTC No. 055-00038, 3/15/02]
- 4.3 The burn-off oven burner shall be fueled exclusively with natural gas.  
[IDAPA 58.01.01.322.14, 5/1/94; PTC No. 055-00038, 3/15/02]

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- 4.4 The heat-input capacity of the burn-off oven burner shall not exceed 2 MMBtu/hr.  
[IDAPA 58.01.01.322.14, 5/1/94]
- 4.5 The gas-fired burn-off oven shall not be operated at temperatures above 1,400 degrees Fahrenheit.  
[IDAPA 58.01.01.322, 3/23/98; PTC No. 055-00038, 3/15/02]
- 4.6 The burn-off oven shall be restricted to 6,000 hooks and paint-encrusted parts, combined, processed in a day.  
[IDAPA 58.01.01.322, 3/23/98; PTC No. 055-00038, 3/15/02]
- 4.7 The burn-off oven shall be used to thermally clean paint, adhesives, and other coatings from paint hooks and paint-encrusted parts.  
[IDAPA 58.01.01.322, 3/23/98; PTC No. 055-00038, 3/15/02]

**Monitoring & Recordkeeping Requirements**

- 4.8 The permittee shall install, calibrate, maintain, and operate a monitoring device for the continuous measurement and recording of the burn-off oven chamber temperature. These records shall be kept onsite for a minimum of two years and shall be made available to Department representatives upon request.
- 4.8.1 The temperature shall be recorded daily while the burn-off oven is operating at normal capacity.
- 4.8.2 The monitoring device must be certified by the manufacturer to be accurate within 1% of the measured value and must be calibrated on an annual basis in accordance with manufacturer instructions.  
[IDAPA 58.01.01.322, 3/23/98; PTC No. 055-00038, 3/15/02]
- 4.9 On days when the burn-off oven is operating, the permittee shall record the number of hooks and paint-encrusted parts processed on that day.  
[IDAPA 58.01.01.322.06.c, 5/1/94]

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**5. FACILITY-WIDE PAINT, SOLVENT, ADHESIVE, AND OTHER CHEMICAL USE****Summary Description**

The following is a narrative description of the facility-wide paint, solvent, adhesive, and other chemical uses regulated in this Tier I operating permit. This description is for informational purposes only.

After metal furniture parts are made and cleaned, they are painted in spray booths. There are six spray booths. The parts are then dried in a flash-off section and two-stage bake oven.

In panel manufacturing, steel sheets are cleaned. Water-based glue is applied, then the parts go through an electric oven to dry the glue. All these activities are insignificant activities.

The paint storage area is used to receive and store paints and solvents. The area also contains a distillation unit for recycling the flushing solvent used primarily during color changes. Paints are mixed in the mixing room, then moved to the pump room or the pump station.

Work surfaces are manufactured from particleboard. Thin sheets of laminate are glued to the fiberboard with a roll coat application process and water-base glue. Work surfaces are cut to shape on either a panel saw or router. Sawdust is collected in one of two baghouses that return filtered air into the room. The laminating and gluing processes are listed under insignificant activities. Solvent-based contact adhesive is used to glue melamine banding material to the wood, using a spray booth during the glue application.

Table 5.1 describes the control devices used in controlling emissions from the sources regulated in this permit.

**Table 5.1 PAINT SPRAY BOOTH EMISSIONS CONTROL DEVICES**

<b>Emission Unit(s) / Process(es)</b>	<b>Emission Control Device</b>
Six paint spray booths	Paint reclaim system and dry filters

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Table 5.2 contains a summary of the requirements that apply to paint, solvent, adhesive, and other chemical uses. Specific permit requirements are listed below Table 5.2.

**Table 5.2 PAINT, SOLVENT, ADHESIVE, AND CHEMICAL USE REQUIREMENTS**

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Monitoring & Recordkeeping Requirements
5.1	VOC content of paint applied	7.51 lb/gal, 40,833 lb/mo, 245.0 T/yr	40 CFR 60, Subpart EE; PTC No. 055-00038	5.9, 5.12, 5.13, 5.17
5.2	PM <sub>10</sub>	1.4 lb/hr, 6.13 T/yr	PTC No. 055-00038	5.10, 5.12, 5.13, 5.16, 5.17
5.3	Formaldehyde	264 lb/yr	PTC No. 055-00038	5.15, 5.18
5.4	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625; PTC No. 055-00038	1.8, 1.10, 1.11
5.5	Fuel type	Natural gas exclusively	PTC No. 055-00038	5.22
5.6	Paint overspray	70%	PTC No. 055-00038	5.6
5.7	Particulate matter	96%	PTC No. 055-00038	5.14
5.8	Filter replacement	Every five days or when efficiency is less than 96%	PTC No. 055-00038	5.14

### ***Permit Limits / Standard Summary***

#### **5.1 Volatile Organic Compound**

As required in 40 CFR 60, Subpart EE, VOC emissions from metal surface coating (sheet metal process and acoustic panel process) shall not exceed 0.9 kilograms per liter of coating solids applied (7.51 lb/gal of solids applied).

**[40 CFR 60, Subpart EE]**

The facility-wide VOC emissions shall not exceed 40,833 pounds per month (lb/mo) or 245.0 T/yr.

**[IDAPA 58.01.01.322.01, 3/19/99; PTC No. 055-00038, 3/15/02]**

#### **5.2 Particulate Matter**

Emissions of PM<sub>10</sub> generated from the use of all paints, adhesives, and other chemicals from the facility shall not exceed 1.4 lb/hr, or 6.13 T/yr.

**[IDAPA 58.01.01.322.01, 3/19/99; PTC No. 055-00038, 3/15/02]**

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**5.3**      **Formaldehyde**

Facility-wide emissions of formaldehyde shall not exceed 264 (lb/yr).

[IDAPA 58.01.01.585 (state-only), 6/30/95; IDAPA 58.01.01.586 (state-only), 3/30/01]  
[PTC No. 055-00038, 3/15/02]

**5.4**      **Visible Emissions**

Visible emissions from any stack, vent, or functionally equivalent opening shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period in accordance with IDAPA 58.01.01.625 and as determined by procedures contained in IDAPA 58.01.01.625.

[IDAPA 58.01.01.625, 4/5/00; PTC No. 055-00038, 3/15/02]

**5.5**      **Allowable Fuels**

The gas burner, dry-off burner, gas burners at the flash-off station, bake ovens, panel washer burner, and the burn-off oven shall be fueled exclusively with natural gas.

IDAPA 58.01.01.322.14, 5/1/94; PTC No. 055-00038, 3/15/02]

**Operation Requirements**

- 5.6**      The permittee shall install, maintain, and operate a paint reclaim system on each of the six metal paint booths. The reclaim system shall have a minimum efficiency of 70% retrieval of paint overspray.

[IDAPA 58.01.01.322, 3/23/98; PTC 055-00038, 3/15/02]

- 5.7**      The permittee shall install and maintain filter systems to control particulate generated at each of the spray paint booths in the sheet metal painting process, work surfaces contact-adhesive application process, and Reasons spray booth. The filter systems shall have a minimum control efficiency of 96%.

[IDAPA 58.01.01.322, 3/23/98; PTC No. 055-00038, 3/15/02]

- 5.8**      The filters shall be replaced every five days of operation, and at any other time that a filter becomes damaged or is otherwise unable to meet the minimum control efficiency of 96%.

[IDAPA 58.01.01.322, 3/23/98; PTC No. 055-00038, 3/15/02]

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5.9 Volatile organic compound emissions shall be calculated using the following equation:

$$VOC = \sum_{i=1}^n (X_i \times Y_i) - \sum_{j=1}^m (W_j \times Y_j)$$

where:

VOC = Emissions of VOC per month and/or year (lb/mo, T/yr)  
n = Number of compounds used  
X<sub>i</sub> = Usage of compound i per month and/or year (lb/mo, T/yr)  
Y<sub>i</sub> = Weight percent of VOC contained in compound i  
m = Number of compounds shipped as hazardous waste  
W<sub>j</sub> = Waste compound j shipped per month and/or year (lb/mo, T/yr)  
Y<sub>j</sub> = Weight percent of VOC contained in compound j  
{Y<sub>j</sub> must be determined by using the test method in Permit Condition 5.12}

Note: *Compound* refers to any paint, adhesive, solvent, or any other VOC containing chemical.

[IDAPA 58.01.01.322, 3/23/98; PTC No. 055-00038, 3/15/02]

5.10 Emissions of PM<sub>10</sub> shall be calculated using the following equation:

$$PM_{10} = \left( \sum_{i=1}^n [i \times p] - [W_j \times p_j] \right) \times 0.4 \times 0.3 \times 0.04$$

where:

PM<sub>10</sub> = Emissions of particulate matter per month or per year (lb/mo, T/yr)  
i = Usage of compound i per month and/or per year (lb/mo, T/yr)  
n = Number of compounds used  
p = percent solids by weight in compound i (% solids)  
0.4.1.1 = 60% transfer efficiency  
0.3.1.1 = 70% reclaim efficiency  
0.04.1 = 96% filter efficiency  
W<sub>j</sub> = Waste compound j shipped per month and/or year (lb/mo, T/yr)  
p<sub>j</sub> = Weight percent of solids contained in compound j

Note: *Compound* refers to any paint, adhesive, solvent, or any other PM containing chemical.

[IDAPA 58.01.01.322, 3/23/98; PTC No. 055-00038, 3/15/02]

### **Monitoring & Recordkeeping Requirements**

#### **5.11 Performance Testing**

The permittee shall conduct an initial performance test, and thereafter, a performance test each calendar month for the facility in accordance with 40 CFR Part 60, Subpart EE, and as per the applicant's submittal. The performance tests shall be conducted as described in 40 CFR 60.313 and 316, as follows:

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If emissions testing is specified, the permittee must schedule such testing within 60 days after achieving the maximum production rate, but not later than 180 days after initial startup. Such testing must **strictly** adhere to the procedures outlined in IDAPA 16.01.01.157, and shall not be conducted on weekends or state holidays without prior written approval by the Department. Testing procedures and specific time limitations may be modified by the Department by prior negotiation if conditions warrant adjustment. The Department shall be notified at least 15 days prior to the scheduled compliance test. Any records or data generated as a result of such compliance test shall be made available to the Department upon request.

The maximum allowable operating rate shall be limited to 120% of the average operating rate attained during any performance test period for which a test protocol has been granted prior approval by the Department, unless (1) the test demonstrates noncompliance; (2) a more restrictive operating limit is specified elsewhere in this permit; or (3) at such an operating rate, emissions would exceed any emission limit(s) set forth in this permit.

The EPA has agreed to allow Harpers to perform monthly calculations to determine compliance in lieu of monthly performance source tests.

**[40 CFR 60, Subpart EE; PTC No. 055-00038, 3/15/02]**

- 5.12 Each month Harpers shall determine VOC and solids content of three samples from each waste stream (still bottoms, baffle paint, and used solvent) that will be included in VOC and PM<sub>10</sub> calculations in the monthly emissions log. The monthly tests will be conducted at Harpers and will be averaged to give a percent VOC and solids in the waste stream. The percent VOC will be used to calculate pounds of VOC to subtract from total VOC used to give actual emissions. The percent solids from waste will be used to calculate pounds of PM to subtract from total PM potentially emitted to give actual emissions. Additionally, Harpers will have a composite sample, representing at least nine containers from each waste stream, analyzed for VOC and solids content by a certified outside laboratory annually. If the outside laboratory results differ from Harpers results by more than 10%, Harpers shall increase outside laboratory analysis to monthly until Harpers results and the certified outside laboratory results differ by less than 10% for three consecutive months, after which the frequency of certified outside laboratory analysis may return to annual.
- 5.13 The permittee shall monitor and record the days of operation of each of the spray paint booths in the sheet metal painting process, work surfaces contact adhesive application process, and Reasons spray booth. The permittee shall also record the date and time that each filter is changed to demonstrate compliance with Permit Condition 5.8. The reason for the filter change shall also be noted (i.e., routine maintenance or damaged filter). The records shall be maintained onsite for a minimum of five years and shall be made available to Department representatives upon request.

**[IDAPA 58.01.01.322, 3/23/98; PTC No. 055-00038, 3/15/02]**

### **Monthly Records**

- 5.14 The permittee shall maintain monthly records which shall contain, but not be limited to, the following information: paint name and identification number; manufacturer; VOC percentage by weight; solids percent by weight; pounds of solids containing paints, adhesives or other chemical compounds used at the facility; and hours of operation of the facility. These records shall be kept onsite for a minimum of five years and shall be made available to Department representatives upon request.

**[IDAPA 58.01.01.322, 3/23/98; PTC No. 055-00038, 3/15/02]**

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- 5.15 The permittee shall maintain records of the amount, in pounds, of each toxic chemical emitted per month. The record shall include all toxic chemicals listed in IDAPA 58.01.01.585 and 586 that are contained in a paint, adhesive, or other chemical used at the facility and exceed 25% of the toxic net screening emission level (EL) by weight.  
[IDAPA 58.01.01.322, 3/23/98; PTC No. 055-00038 (state-only), 3/15/02]

- 5.16 The permittee shall monitor and record the hours of operation each day.  
[IDAPA 58.01.01.322, 3/23/98; PTC No. 055-00038, 3/15/02]

- 5.17 The permittee shall calculate the monthly weighted average solids percent by weight of all paints containing solids, all adhesives, and other chemicals used at the facility to determine compliance with Permit Conditions 5.2, 5.3, 5.9, and 5.10. The permittee shall also calculate the total monthly emissions of PM<sub>10</sub> using the equation in Permit Condition 5.10 and VOCs using the equation in Permit Condition 5.9 from all paints, adhesives, solvents, and other chemicals used at the facility for the month. The monthly emissions of PM<sub>10</sub> shall be converted to a pounds-per-hour (lb/hr) value by dividing the monthly emission rate by the hours of operation to determine compliance with the emission limits listed for this permit.

All data and calculations used to determine VOC, PM<sub>10</sub>, and toxic emissions from the facility shall be maintained onsite for the most recent five-year period, and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.322, 3/23/98; PTC No. 055-00038, 3/15/02]

- 5.18 Each month, the usage of toxic compounds listed in IDAPA 58.01.01.585 shall be converted to a pound-per-hour value by dividing the previous month's usage rate by the previous month's hours of operation to determine if the emissions rate is less than the screening emission level in IDAPA 58.01.01.585. Each year, the usage of toxic compounds listed in IDAPA 58.01.01.586 shall be converted to a pound-per-hour value by dividing the previous year's usage rate by the previous years hours of operation to determine if the emission rate is less than the screening emission level in IDAPA 58.01.01.585.

All data and calculations used to determine VOC, PM<sub>10</sub>, and toxic emissions from the facility shall be maintained onsite for the most recent five-year period and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.322, 3/23/98; PTC No. 055-00038 (state-only), 3/15/02]

- 5.19 For all periods when emissions units, process equipment, or similar are not in operation, the permittee shall indicate so for all applicable monitoring, recordkeeping, and reporting requirement(s) mandated by this permit.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

## **Reporting**

### **5.20 Sample Calculations and Records**

The permittee shall submit a sample of the monthly records required in Permit Conditions 5.14 and 5.15, as well as emissions calculations required in Permit Condition 5.17, to the Department for approval within 30 days of the date of this permit.

[PTC No. 055-00038, 3/15/02; IDAPA 58.01.01.322, 3/23/98]



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**5.21     Semiannual Reports**

The permittee shall submit a written report semiannually to the Department detailing the information required to be monitored in Permit Conditions 5.11, 5.14, and 5.17 no later than 30 days after the end of the semiannual period and in accordance with 40 CFR 60, Subpart EE. In addition to the other information required, each semiannual report shall contain the total pounds of solids contained in the paints used, the amount and type of adhesives used, and other chemical compounds used; the total tons of VOCs emitted; the total pounds of toxics emitted; the annual hours of operation; and the total tons of PM<sub>10</sub> and VOCs emitted during the previous consecutive 12-month period.

[IDAPA 58.01.01.322, 3/23/98; PTC No. 055-00038 (state only), 3/15/02]

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## 6. INSIGNIFICANT ACTIVITIES

Activities and emissions units identified as insignificant under IDAPA 58.01.01.317.01(b) are listed in the Tier I operating permit to qualify for a permit shield.

Table 6.1 lists the insignificant activities described by the source in accordance with IDAPA 58.01.01.317.

**Table 6.1 INSIGNIFICANT ACTIVITIES**

<b>Description</b>	<b>Insignificant Activities Section Citation IDAPA 58.01.01.317.01</b>
Five natural gas space heaters, 2.2 MMBtu/hr each	b.i.18
One natural gas space heater, 1.0 MMBtu/hr	b.i.18
One natural gas burner on stage 1 of the paint line parts washer, 3.8 MMBtu/hr	b.i.5
One natural gas burner on stage 2 of the paint line parts washer, <5.0 MMBtu/hr	b.i.5
One natural gas burner on stage 4 of the paint line parts washer, 3.8 MMBtu/hr	b.i.5
One natural gas burner on stage 5 of the paint line parts washer, <5.0 MMBtu/hr	b.i.5
One natural gas burner on the panel washer, 2.0 MMBtu/hr	b.i.5
Two wood dust baghouses located inside the building with exhaust air being ducted inside the building, no air exhausted outside	b.i.30
54 spot welders	a.i.12
6 brazing stations	a.i.12
One natural gas burner located on the air make-up unit for the storage, mixing and pump rooms, 0.80 MMBtu/hr	b.i.5 and b.i.18
One natural gas burner located on the air make-up unit for the west office area, 0.40 MMBtu/hr	b.i.5 and b.i.18
One natural gas burner located on the air make-up unit for the work surfaces manufacturing area, 3.0 MMBtu/hr	b.i.5 and b.i.18
One natural gas burner located on the air make-up unit for the maintenance shop and tool and die room, 0.90 MMBtu/hr	b.i.5 and b.i.18
Natural gas heat pump loop system, 0.50 MMBtu/hr	b.i.5

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**Table 6.1 INSIGNIFICANT ACTIVITIES (CONTINUED)**

<b>Description</b>	<b>Insignificant Activities Section Citation IDAPA 58.01.01.317.01</b>
Natural gas snow melt system, 1.0 MMBtu/hr	b.i.5
Natural gas hot water heater for bathrooms, 0.75 MMBtu/hr	b.i.18
Various bathroom and sewer vents	a.i.42 and 43
One natural gas emergency generator, 0.72 MMBtu/hr	b.i.5
Various roof-mounted exhaust fans for pulling out hot air in summer, 15,600 CFM each	a.i.41
Various opaque smoke vents to be used in the event of fire	a.i.46
Water base glue application	b.i.25 and 30
Rinse off booth to rinse off ash from hangers after burn-off oven	b.i.30
Electric test oven located in the metal paint area	a.i.45
Two electric infrared ovens located in the panel manufacturing area	a.i.45
Various battery chargers located throughout the building	a.i.67

- 6.1 There are no monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities beyond those required in the facility-wide permit conditions.

[IDAPA 58.01.01.322, 3/23/98]

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**TIER I OPERATING PERMIT GENERAL PROVISIONS**

***General Compliance***

1. The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation and is grounds for enforcement action, for permit termination, revocation and reissuance, or revision, or for denial of a permit renewal application.  
[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]
2. It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.  
[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]
3. Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.  
[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

***Reopening***

4. This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.  
[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99;  
40 CFR 70.7(f)(1) and (2); 40 CFR 70.6(a)(6)(iii)]
5. The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.  
[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

***Property Rights***

6. This permit does not convey any property rights of any sort, or any exclusive privilege.  
[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

***Information Requests***

7. The permittee shall furnish all information requested by the Department, within a reasonable time, that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.  
[Idaho Code §39-108; IDAPA 58.01.01.122 (5/1/94) and 322.15.f (4/5/00); 40 CFR 70.6(a)(6)(v)]

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8. Upon request, the permittee shall furnish to the Department copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.  
[IDAPA 58.01.01.322.15.g 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

**Severability**

9. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.  
[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

**Changes Requiring Permit Revision or Notice**

10. The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee shall comply with IDAPA 58.01.01.380 through 386 as applicable.  
[IDAPA 58.01.01.200-223, 4/5/00; IDAPA 58.01.01.322.15.i, 380-386, 3/19/99; 40 CFR 70.4(b)(12), (14) and (15); 40 CFR 70.7(d) and (e)]
11. Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the Clean Air Act (CAA), 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off-permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.  
[IDAPA 58.01.01.381-385, 3/19/99; IDAPA 58.01.01.209.05, 5/1/94; 40 CFR 70.4(b)(14) and (15)]

**Federal and State Enforceability**

12. Unless specifically identified as a "State-only" provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source's potential to emit, are enforceable: (i) by the Department in accordance with state law; and (ii) by the United States or any other person in accordance with federal law.  
[IDAPA 58.01.01.322.15.j, 5/1/94; 40 CFR 70.6(b)(1) and (2)]
13. Provisions specifically identified as a "State-only" provision are enforceable only in accordance with state law. "State-only" provisions are those that are not required under the federal Clean Air Act or under any of its applicable requirements or those provisions adopted by the state prior to federal approval.  
[Idaho Code §39-108; IDAPA 58.01.01.322.15.k, 3/23/98]

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***Inspection and Entry***

14. Upon presentation of credentials, the permittee shall allow the Department or an authorized representative of the Department to do the following:
- a. Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.
- [Idaho Code §39-108; IDAPA 58.01.01.322.15.i, 3/19/99; 40 CFR 70.6(c)(2)]

***New Requirements During Permit Term***

15. The permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.
- [IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94;  
40 CFR 70.6(c)(3) citing 70.5(c)(8)]

***Fees***

16. The owner or operator of a Tier I source shall pay annual registration fees to the Department in accordance with IDAPA 58.01.01.525 through IDAPA 58.01.01.538.
- [IDAPA 58.01.01.322.15.n, 5/1/94; 40 CFR 70.6(a)(7)]

***Certification***

17. All documents submitted to the Department shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.
- [IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

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**Renewal**

18. a. The owner or operator of a Tier I source shall submit an application to the Department for a renewal of this permit at least 6 months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application 9 months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

- b. If a timely and complete application for a Tier I operating permit renewal is submitted, but the Department fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

**Permit Shield**

19. Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:
- a. Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
- i. The Department has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
- b. The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
- c. Nothing in this permit shall alter or affect the following:
- i. Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
- ii. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
- iv. The ability of the EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of the Department to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 322.15.m, 325, 5/1/94;  
IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99;  
40 CFR 70.6(f)]

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***Compliance Schedule and Progress Reports***

20. a. For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
- b. For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
- c. For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.
- d. For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 10, 5/1/94;  
40 CFR 70.6(c)(3) and (4)]

***Periodic Compliance Certification***

21. The permittee shall submit compliance certifications during the term of the permit for each emissions unit to the Department and the EPA as follows:
- a. Compliance certifications for all emissions units shall be submitted annually beginning 12 months from the permit issuance date, or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by the Department;
- b. The compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices;
- c. The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
- i. The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
- ii. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required by this Tier I operating permit. If necessary, the owner or operator shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the CAA which prohibits knowingly making a false certification or omitting material information;



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- iii. The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Paragraph 21.c.ii above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred;
  - iv. Such other facts as the Department may require to determine the compliance status of the source.
- d. All original compliance certifications shall be submitted to the Department and a copy of all compliance certifications shall be submitted to the EPA.  
[IDAPA 58.01.01.322.11, 5/1/94; 40 CFR 70.6(c)(5)(iii); 40 CFR 70.6(c)(5)(iv)]

***False Statements***

22. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.  
[IDAPA 58.01.01.125, 3/23/98]

***No Tampering***

23. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.  
[IDAPA 58.01.01.126, 3/23/98]

***Semiannual Monitoring Reports***

24. In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months starting six months from the date of permit issuance. All instances of deviations from this operating permit's requirements must be clearly identified in the report. All required reports must be certified in accordance with IDAPA 58.01.01.123.  
[IDAPA 58.01.01.322.15.q (3/23/98) and 322.08.c (4/5/00); 40 CFR 70.6(a)(3)(iii)]

***Reporting Deviations and Excess Emissions***

25. The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130-136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.  
[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

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***Permit Revision Not Required***

26. No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.  
[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

***Emergency***

27. In accordance with IDAPA 58.01.01.332, an "emergency" as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.  
[IDAPA 58.01.01.332.01, 3/19/99; 40 CFR 70.6(g)]